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and Mark Sorci

9

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 GEOFFREY GROVE,

13 Plaintiff,

14 v.

15 E.K. MCDANIEL, et al.,

16 Defendants

Case No. 3:17-cv-00245-RCJ-CBC

17 **MOTION FOR EXTENSION OF TIME
TO FILE DISPOSITIVE MOTIONS**
(Second Request)

18 Defendants, Tara Carpenter, E.K. McDaniel, and Mark Sorci (Defendants), by and
19 through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Ian E.
20 Carr, Deputy Attorney General, hereby submit their Motion for Extension of Time to File
21 Dispositive Motions (Second Request). This Motion is based on Federal Rule of Civil
22 Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all
23 papers and pleadings on file in this action.

24 **MEMORANDUM OF POINTS AND AUTHORITIES**

25 **I. ARGUMENT**

26 Defendants respectfully request a thirty (30) day extension of time out from the
27 current deadline (June 7, 2019) to file dispositive motions in this case. Defense counsel is
28 confronted with numerous competing deadlines and a high workload due to staffing

1 changes in the Office of the Attorney General. However, such obstacles are currently
2 being resolved and the requested extension of time should afford Defendants adequate
3 time to file dispositive motions in this case.

4 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as
5 follows:

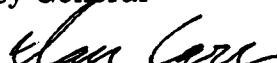
6 When an act may or must be done within a specified time, the
7 court may, for good cause, extend the time: (A) with or without
8 motion or notice if the court acts, or if a request is made, before
9 the original time or its extension expires; or (B) on motion made
after the time has expired if the party failed to act because of
excusable neglect.

10 Defendants' request is timely and its limited nature will not hinder or prejudice Plaintiff's
11 case, but will allow for a thorough briefing to narrow or eliminate issues in this case. The
12 requested thirty (30) day extension of time should permit the parties time to adequately
13 research draft, and submit dispositive motions in this case. Defendants assert that the
14 requisite good cause is present to warrant the requested extension of time.

15 For these reasons, Defendants respectfully request a thirty (30) day extension of
16 time from the current deadline to file dispositive motions in this case, with a new
17 deadline to and including Monday, July 8, 2019.

18 DATED this 7th day of June, 2019.

19 AARON D. FORD
20 Attorney General

21 By: 
22 IAN E. CARR
23 Deputy Attorney General
24 State of Nevada
25 Bureau of Litigation
26 Public Safety Division
27 Attorneys for Defendants

28 IT IS SO ORDERED.

U.S. MAGISTRATE JUDGE

DATED: June 10, 2019

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 7th day of June, 2019, I caused a copy of the foregoing, **MOTION FOR EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS (Second Request)**, to be served, by U.S. District Court CM/ECF Electronic Filing on the following:

GEOFFREY GROVE #1041134
Care of LCC Law Librarian
Lovelock Correctional Center
1200 Prison Road
Lovelock, Nevada 89419
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Connie L. Sorenson
An employee of the
Office of the Attorney General